

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE: Jorge Velasquez, Jr and Alma Rosa Velasquez,	§ § § § §	CASE NO. 12-32094
Debtors.		Chapter 13 Proceeding

**MOTION TO VACATE ORDER OF DISMISSAL AND
REINSTATE CHAPTER 13 CASE**

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within twenty-one days from date of service, the relief requested in the motion may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Come now, Debtors through their attorney of record, W. Matt Watson., pursuant to Rule 59, file this Motion To Vacate Order of Dismissal and Reinstate Chapter 13 Case and for cause shows the Court the following:

I.

The Debtors filed a Voluntary Petition for Relief under Chapter 13 of Title 11, United States Code, on November 2, 2012 with payments of \$210.00 per month for 60 months. The plan submitted was confirmed on January 11, 2013.

II.

On October 23, 2014 this Honorable Court entered an Order Dismissing Chapter 13 Case due to failure to cure default as stated within the Trustee's warning letter. It is document number 20 on the Courts Docket. On the same day of the dismissal Debtors sent in payment for their Chapter 13 plan. This motion is timely filed.

III.

Not reinstating the Debtors case would cause unjust harm to the Debtors and will render them incapable of successfully reorganizing.

IV.

At the time of the filing of this motion, Debtors are current on plan payments and proof of said payments are attached herein as "Exhibit A."

V.

Debtors will make sure that remaining plan payments are sent out in a timely manner and that all other Chapter 13 requirements are complied with.

WHEREFORE PREMISES CONSIDERED, Debtors pray that this Court vacate the Order Dismissing Debtors' Chapter 13 Case that was entered October 23, 2014, and reinstate the Debtors case. Debtors pray for such other and further relief as is just.

DATED this the 29th day of October, 2014.

RESPECTFULLY SUBMITTED

WATSON LAW FIRM, P.C.

BY: /s/ W. Matt Watson

W. Matt Watson

SBN: 24028878

1123 E. Rio Grande

El Paso, Texas 79902

PH: (915) 532-7526

FAX: (866) 201-0967

ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2014, a true and correct copy of the foregoing instrument was served electronically to the parties listed on the court's electronic matrix and by first class mail to the creditors and parties in interest pursuant to the attached matrix..

/s/ W. Matt Watson
W. Matt Watson

WESTERN UNION		MONEY ORDER	
WESTERN UNION FINANCIAL SERVICES INC. - ISSUER • Englewood, Colorado		17-100705569	
Payable at Wells Fargo Bank, Grand Junction • Downtown, N.A. Grand Junction, Colorado			
A 655866 D 102814			
T 1319 02			
L 171007055693 L 000096		\$ 400.00	
PAY EXACTLY FOUR HUNDRED DOLLARS AND NO CENTS			
PAY TO THE ORDER OF Stuart C. Cox		acct D-32094	
3509 Diana PUGHES Affe Bl Paso Tx		79938	
79938			
171007055693			

AT&T
Attn: Bankruptcy Dept.
P.O. Box 57907
Murray, UT 84157-0907

Gemb/care Credit
Attn: bankruptcy
PO Box 103104
Roswell, GA 30076

Stuart C. Cox, Trustee
1760 North Lee Trevino
El Paso, TX 79936

Bk Of Amer
Attn: Bankruptcy/MC: NC4-105-03
PO Box 26012
Greensboro, NC 27410

Gvt Emp Cu
7227 Viscount Blvd
El Paso, TX 79925

USBC

Cap One
Po Box 5253
Carol Stream, IL 60197

Gvt Emp Cu
Po Box 20998
El Paso, TX 79998

Cap1/
Po Box 5253
Carol Stream, IL 60197

Jefferson Capital Systems
PO Box 7999
Saint Cloud, MN 56302-9617

Cap1/bstby
Po Box 5253
Carol Stream, IL 60197

Kohls/capone
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051

Central Finl Control
Po Box 66051
Anaheim, CA 92816

LTD Financial Services, L.P.
7322 Southwest Freeway, Ste. 16
Houston, TX 77074

Citibank Usa
CITICORP CREDIT SERVICES/ATTN:
PO Box 20363
Kansas City, MO 64195

Med Busi Bur
1460 Renaissance Dr
Park Ridge, IL 60068

Credit Collection Services
Two Wells Avenue, Dept. 587
Newton, MA 02459

Onemain Fi
Po Box 499
Hanover, MD 21076

Gecrb/ashley Furniture
950 Forrer Blvd
Kettering, OH 45420

Paramount Recovery
Attn: Bankruptcy
PO Box 788
Lorina, TX 76655

Gecrb/discount Tire
C/o Po Box 965036
Orlando, FL 32896

Sears Credit Cards
PO Box 183081
Columbus, OH 43218-3081

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**ORDER ON MOTION TO VACATE ORDER AND
REINSTATE CHAPTER 13 CASE**

On this day, came on to be considered the Motion to Vacate Order of Dismissal and Reinstatement Chapter 13 Case filed by the subject Debtors herein. The Court finds that all creditors and parties in interest were duly and properly given notice of Debtors' proposal and that, after review of the motion and any responses and evidence submitted therewith, the Court finds that the proposed Motion is in the best interest of the estate. It is therefore,

ORDERED ADJUDGED AND DECREED that the motion is hereby
GRANTED as follows:

The Order for Summary Dismissal entered on October 23, 2014, as Document Number 20 in the Court's Docket is hereby VACATED and of no further force of effect; and, the case is hereby REINSTATED in the Court's docket.

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Watson Law Firm, P.C
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El Paso, TX 79902